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CHARLES H. COOK
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March 24, 2005

VIA HAND DELIVERY

Mr. Charles Terreni
Chief Clerk of the Commission
SC Public Service Commission
P. O. Drawer 11649
Columbia, SC 29211

RECEIVED
2005 MAR 24 PM 4:08
SC PUBLIC SERVICE
COMMISSION

RE: Application of Wyboo Plantation Utilities, Inc. for an Increase in Its Rates
and Charges for Water and Sewer Service
Docket No. 2005-13-W/S

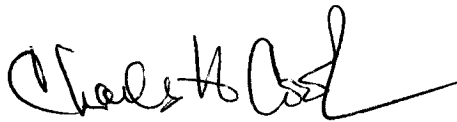
Dear Mr. Terreni:

Enclosed please find for filing an original and ten (10) copies of the Petition to Intervene of the Wyboo Plantation in the above-captioned matter. By copy of this letter, I am serving all parties of record.

I have enclosed an extra copy of this petition which I would ask you to date stamp and return to me by my courier. If you have questions, please feel free to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.



Charles H. Cook

CHC/mlw

Enclosures

c: All parties of record (w/Encl.)

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Application of Wyboo Plantation Utilities, Inc. for an
Increase in Its Rates and Charges for Water
and Sewer Service

DOCKET NO.: 2005-13-W/S

PARTIES SERVED: Wendy Cartledge, Esquire
Office of Regulatory Staff
P.O. Box 11263
Columbia, S.C. 29211

Mark S. Wrigley, CEO
Wyboo Plantation Utilities, Inc.
PO Box 2099
Sumter, S.C. 29151

PLEADING: PETITION TO INTERVENE BY WYBOO
PLANTATION OWNERS ASSOCIATION, INC.

March 24, 2005



Marcia L. Walters

SO FIELD SERVICE
COMMISSION

2005 MAR 24 PM 4:03

RECEIVED

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INTERVENOR

112 5/26/05 10:30

ORIGINAL

BEFORE

THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2005-13-W/S

ACCEPTED

2033-25-15

SOUTH CAROLINA
PUBLIC SERVICE
COMMISSION

2005 JUN 24 PM 4:03

RECORDED

IN THE MATTER OF:

Application of Wyboo Plantation
Utilities, Inc. for an Increase in Its Rates
And Charges for Water and Sewer Service

PETITION TO INTERVENE

The Wyboo Plantation Owners Association, Inc. (Petitioner) hereby petitions the South Carolina Public Service Commission (Commission) pursuant Rule R. 103-836 of the Commission's Rules of Practice and Procedure, to intervene as a party of record in the above-referenced Docket. In support of this Petition, Petitioner states the following:

1. On January 7, 2005, Wyboo Plantation Utilities, Inc. (Applicant) filed an Application with the Commission seeking a new schedule of rates and charges for water and sewer service for its customers in Clarendon County, South Carolina.
2. The Commission has assigned Docket No. 2005-13-W/S to this matter.
3. Petitioner is a South Carolina non-profit corporation organized for the purposes, inter alia, of providing representative self-government to the owners and residents of the Wyboo Plantation community and ownership, maintenance and use of the community's common properties for the benefit of the owners and residents of the Wyboo Plantation community.

RETURN DATE: OK D. Duke
SERVICE: OK D. Duke

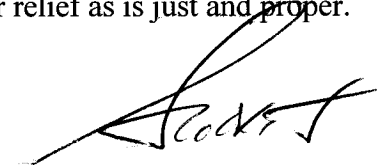
4. The Petitioner's common properties owned, maintained and used by the Petitioner include facilities for which Petitioner purchases water and sewer service from the Applicant.
5. Petitioner is authorized to take such actions as are necessary for the health, welfare, safety and common good of the association and is so authorized to intervene in this matter.
6. Petitioner would intervene herein in its representative capacity on behalf of the owners and residents of the Wyboo Plantation community who are water and sewer service customers of Applicant and in its individual capacity as a water and sewer service customer of Applicant; accordingly, Petitioner has a direct and material interest in the issues to be addressed and resolved by the Commission in this Docket. Petitioner would oppose the application filed by the Applicant for adjustment in rates and charges for the provisions of water and sewer service and would oppose any rates and charges requested which are not just and reasonable nor based upon sound and verifiable cost analysis.
7. Petitioner intends to present testimony and exhibits at any evidentiary hearing before the Commission in this Docket. Because the issues are only generally defined at this preliminary stage of the proceeding, Petitioner is unable to give a reliable estimate of how much time it would require to present its evidence at a hearing. Petitioner would anticipate calling as many as three (3) witnesses and should require no more than two (2) hours to present its evidence; however, Petitioner will provide a more accurate estimate prior to the commencement of any hearing.
8. Petitioner's address is: Wyboo Plantation Owners Association, Inc.; 100 Recreation Drive; Manning, South Carolina 29102.

9. In accordance with Rule R. 103-804 (s) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:

Scott Elliott, Esquire
Charles H. Cook, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, South Carolina 29205
Telephone: 803-771-0555
Fax: 803-771-8010

WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- c. For such other and further relief as is just and proper.



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FAX: 803-771-8010

Attorneys for Petitioner, Wyboo Plantation Owners
Association, Inc.

Columbia, South Carolina
March 24, 2005